

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL
CIRCUIT, IN AND FOR DUVAL COUNTY, FLORIDA

TAMI L. MARTIN,

Plaintiff,

CASE NO.: 03-7316-CA
DIVISION: CV-F

v.

FORD MOTOR COMPANY,
a foreign corporation, and
KINGS CROWN FORD, INC.
d/b/a KINGS CROWN KINGS CROWN
AT THE AVENUES, a corporation.

Honorable Charles O. Mitchell, Jr.

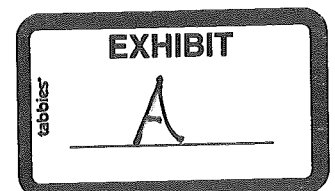
Defendants.

FORD MOTOR COMPANY'S NOTICE OF SERVING VERIFIED SUPPLEMENTAL
RESPONSE TO PLAINTIFF'S THIRD SET OF INTERROGATORY

Defendant Ford Motor Company, pursuant to applicable Rules of Civil Procedure, hereby gives notice that it has forwarded the original and one copy of its Verified Supplemental Response to Plaintiff's Third Set of Interrogatory, with a copy of this Notice via Facsimile and U.S. Mail to: Angelo M. Patacca, Jr., Esquire, Blackstone Building, 8th Floor, 233 East Bay Street, Jacksonville, FL 32202, counsel for Plaintiff; and Robert Langdon, Esq., Langdon and Emison, The Eagle Building, 911 Main Street, Lexington, MO 64067, counsel for Plaintiff.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by facsimile and U.S. Mail this 2nd day of June, 2005, to: Angelo M. Patacca, Jr., Esq., Blackstone Building,



8th Floor, 233 East Bay Street, Jacksonville, FL 32202; Robert Langdon, Esq., Langdon and
Emison, The Eagle Building, 911 Main Street, Lexington, MO 64067.



FRANCIS M. McDONALD, JR., Esq.

Florida Bar No. 327093

WENDY MIA PARDEW, Esq.

Florida Bar No. 629618

CARLTON FIELDS, P.A.

450 S. Orange Avenue, Suite 500

Orlando, Florida 32801

Phone: (407) 849-0300

Fax: (407) 648-9099

*Attorneys for Ford Motor Company and Kings
Crown Motor Company*

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Defendants.

FORD MOTOR COMPANY'S
SUPPLEMENTAL RESPONSE TO PLAINTIFF'S THIRD INTERROGATORY

Defendant, Ford Motor Company ("Ford"), hereby submits its Supplemental Response to Plaintiff's Third Interrogatory.

1. Please identify the total amount of money you have paid, or that law firms representing you in product liability lawsuits have paid, to the following individuals from January 1, 1995, to January 1, 2005:

- (a) Biodynamic Research Corporation;
- (b) Carr Engineering, Inc., and
- (c) Applied Safety and Ergonomics, Inc.

RESPONSE: Ford objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks the discovery of information or documents that are neither relevant to the issues in this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, it is Ford's understanding that for all three of the entities mentioned, any available billing records will pertain to the entire organization and do not break down amounts paid to any one individual within the firms.

SUPPLEMENTAL RESPONSE: Ford states that it paid the following fees, costs and disbursements to Biodynamic Research Corporation, Carr Engineering, Inc. and Applied Safety and Ergonomics, Inc. from January 1, 2000 to December 31, 2004:

- Biodynamic Research Corporation - \$14,464,506.11
- Carr Engineering, Inc. - \$29,131,425.09
- Applied Safety and Ergonomics, Inc. - \$1,471,291.16

The above amounts include engineering work unrelated to litigation. Ford does not have records indicating the amounts paid for any one individual's work within a firm for Ford-related activities. Accordingly, the above amounts represent the fees, costs and disbursements associated with all work performed on behalf of Ford at Biodynamic Research Corporation, Carr Engineering, Inc. and Applied Safety and Ergonomics, Inc. from January 1, 2000 to December 31, 2004.

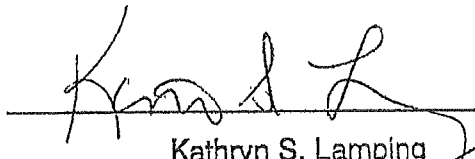
STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE)

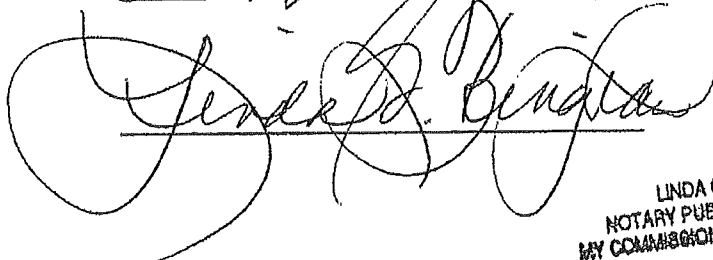
Kathryn Lamping

_____, being duly sworn, deposes and says that the deponent is an authorized agent of Ford Motor Company, and that the deponent verifies the foregoing Supplemental Response to Plaintiff's Third Interrogatory for and on behalf of Ford Motor Company and is duly authorized so to do; that the matters stated therein are not within the personal knowledge of the deponent; that the facts stated therein have been assembled by authorized employees and counsel of Ford Motor Company, and the deponent is informed that the facts stated therein are true.


Kathryn S. Lamping
Assistant Secretary

Subscribed and sworn to before me this

31 day of May, 2005



LINDA G. BINGHAM
NOTARY PUBLIC WAYNE CO., MI
MY COMMISSION EXPIRES Aug 15, 2005